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Hon. Brian D. Lynch
Chapter 7
Noted: Wed., Jan 15, 2020
at 9:00 a.m.
Response date: 1/8/20

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7 IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN
8 DISTRICT OF WASHINGTON AT TACOMA
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10 In re:

11 GREGORY R. DUCHARME, KIMBERLY
12 D. DUCHARME,
13 Debtors.

NO. 19-43703-BDL

DECLARATION OF KACEE ROBINSON
IN SUPPORT OF SECURED CREDITOR
MOUNTAIN AMERICA CREDIT UNION'S
MOTION FOR RELIEF FROM STAY

14 Kacee Robinson makes the following declaration:
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16 1. I am a Bankruptcy Specialist for secured creditor Mountain America Credit
17 Union and make this declaration based upon my personal knowledge.

18 2. On or about July 5, 2017, debtors, Greg and Kimberly Ducharme, executed
19 a Retail Installment Sale Contract, copy attached hereto as Exhibit 1 and by this reference
20 incorporated herein as if more fully set forth. By the terms of said agreement, debtor
21 borrowed the principal sum of \$39,814.17.

22 3. Mountain America Credit Union took a security interest in a 2018 Keystone
23 Hideout RV automobile purchased by debtors. Said security interest was perfected by
24 issuance of State of Washington Vehicle Certificate of Title, Title No. 1771065524, in favor
25 of Mountain America Credit Union as legal owner, copy attached hereto as Exhibit 2 and
26 by this reference incorporated herein as if more fully set forth.

27 4. Debtors have defaulted under the terms of their agreement with Mountain
28 America Credit Union. The account is owing for August 2019. The current balance due

DECLARATION OF KACEE ROBINSON - 1

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1 and owing is \$37,396.06 through November 21, 2019, monthly payments are in the sum
2 of \$373.86. The current fair market value of the vehicle is approximately \$27,600.00.

3 5. Mountain America Credit Union is entitled to an order lifting the stay allowing
4 repossession and resale of the vehicle.

5 6. Mountain America Credit Union further requests an order waiving the
6 provisions of BR 4001(a)(3) so that it may forthwith commence or continue repossession
7 action through appropriate legal channels.

8 I declare under penalty of perjury under the laws of the States of Washington and
9 Utah that the foregoing is true and correct.

10 SIGNED AT Sandy, Utah this 16th day of December, 2019.

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13 Kacee Robinson
14 Bankruptcy Specialist
15 Mountain America Credit Union
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